

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

OCT 10 2012

Darrin Wright

Plaintiff(s),

vs.

Chicago Police Dept.

See attached for additional defendant

Defendant(s).

THOMAS G BRUTON
CLERK, U S DISTRICT COURT

12cv8148

Judge Robert W. Gettleman
Magistrate Arlander Keys

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

- This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
- The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
- Plaintiff's full name is Darrin A Wright.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

ADDITIONAL DEFENDANTS

POLICE OFFICER JANE DOE #1

POLICE OFFICER JANE DOE #2

POLICE OFFICER JANE DOE #3

POLICE OFFICER JOHN DOE #1

POLICE OFFICER JOHN DOE #2

POLICE OFFICER JOHN DOE #3

POLICE OFFICER JOHN DOE #4

POLICE OFFICER JOHN DOE #5

POLICE OFFICER JOHN DOE #6

POLICE OFFICER JOHN DOE #7

POLICE OFFICER SANDRA BRYANT

POLICE OFFICER ROBERT CRANSTON

4. Defendant, Jane Doe #1, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or
☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows *(Place X in each box that applies)*:

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☐ conspired together to violate one or more of plaintiff's civil rights;
☒ Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, Jane Doe #2, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;

Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, Jane Doe #3, is
(name, badge number if known)

☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)

plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☒ conspired together to violate one or more of plaintiff's civil rights;

Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*):

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #1, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government)
 or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
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 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
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(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☐ conspired together to violate one or more of plaintiff's civil rights;
☒ Other:

SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #2, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☒ conspired together to violate one or more of plaintiff's civil rights;

Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #3, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows *(Place X in each box that applies)*:

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☐ conspired together to violate one or more of plaintiff's civil rights;

Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #4, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other: SEE attached pg # 45(A) John Doe
number 7

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #5, is
(name, badge number if known)
☒ an officer or official employed by Chicago's Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, Police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☐ conspired together to violate one or more of plaintiff's civil rights;
☒ Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #6, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows *(Place X in each box that applies)*:

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other: SEE attached pg # 45(A) John Doe
number 7

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, John Doe #7, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows *(Place X in each box that applies)*:

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☐ conspired together to violate one or more of plaintiff's civil rights;
- ☒ Other: SEE attached pg # 45(A) John Doe
number 7

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, Sandra Bryant, Chicago Police officer, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☐ conspired together to violate one or more of plaintiff's civil rights;

Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

4. Defendant, Police officer Robert Cranston, is
(name, badge number if known)
☒ an officer or official employed by Chicago Police Dept.;
(department or agency of government) or

☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Chicago (Chicago, police Dept.). As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 8/1/12, at approximately 7:00 ☐ a.m. ☒ p.m.
(month, day, year)
 plaintiff was present in the municipality (or unincorporated area) of

Chicago, in the County of Cook,
 State of Illinois, at 6326 S Peoria,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
☐ searched plaintiff or his property without a warrant and without reasonable cause;
☒ used excessive force upon plaintiff;
☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
☐ failed to provide plaintiff with needed medical care;
☐ conspired together to violate one or more of plaintiff's civil rights;
 Other: SEE attached pg # 45(A) John Doe
number 1

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): _____

8. Plaintiff was charged with one or more crimes, specifically:

NOTICE: TO THE CLERK AND COURT, THIS MATTER IS CURRENTLY BEING INVESTAGATED BY THE INDEPENDENT POLICE REVIEW (LOG#1056988) 1615 W CHICAGO AVE, 60622, (312)746-3609 -- ALSO BY THE INTERNAL AFFAIRS DIVISION #1056705, BY POLICE OFFICER DAVID WOODS 3510 S MICHIGAN(312)745-6310:

GERNERAL ALLEGATION FOR ALL DEFENDANTS

On august 1st at approximately 7:00pm the plaintiff who is African American was driving East on Marquette street (6700 south). Plaintiff was stopped by the defendants (police officers) at 1225 W Marquette. After this stop, a high speed chase ensued. After several blocks Plaintiff stopped his vehicle northbound at 6326 S Peoria approximately two miles away. Plaintiff got out his vehicle **got down on both knees and locked both hands behind his head**. Several White officers rushed plaintiff started to repeatedly stomping, kicking and hitting plaintiff. During the course of this beating plaintiff's head was bashed into the ground, chest kicked, and face smashed into the ground. Plaintiff then heard "taker him" after which plaintiff was tazered numerous times, in the back. Throughout the entire beating and tazer plaintiff did not try to resist nor did plaintiff do anything to provoke the brutality nor did plaintiff pose or present any threat to any of the officers.

When the beating and tazering stopped, plaintiff was drug over to a marked police vehicle and a white male police officer with captain bars said "what did you have in the bag? Are you crazy we should've shot you, sit down." John Doe #(2) came over and said get up let me get my tazer. He attempted to get the tazer prongs out of plaintiff's back but they were stuck in plaintiff's back. And John doe # (2) said "They're stuck" Jane doe #(1) "said just snatch them out" JOHN DOE #(2) YANKED THE PRONGS OUT AND TORE SKIN FROM PLAINTIFF'S BACK

The beating took place in back of the "Mercy Englewood housing" building 900 w 63rd street, Chicago, Illinois. This building has four cameras facing the exact spot where the beating took place. Also "U.S." Bank, 815 w 63rd (773)873-8800, Has a Drive through/Mobile branch(858 w 63rd Street). The rear door camera points directly where the beating took place the beating may be on the tape.

Plaintiff was taken to St. Bernard Hospital, While waiting to be treated the defendants took plaintiff into a 5x8 room where five police thereafter Jane doe #(2) and Jane Doe #(3) scared and intimidated plaintiff and repeatedly asked him questions.

Plaintiff was taken to the 7th district police station located at 63rd and Loomis. While being booked by the civilian staff, plaintiff was asked "do you have anything on you?" by the civilian worker. Plaintiff said "yes my money." the civilian worker told the uniformed police officer "you supposed to inventory his property" The officer responded this isn't my guy" the civilian guy said "I don't care" They argued a few minutes and plaintiff gave the civilian worker \$300.00 cash and it was placed in a property bag. A property slip #2274251 was later giving to plaintiff.

At some point during the instant complaint someone took plaintiff's \$300.00 from the property bag without due process of law. A report was filed by the Cook county Sheriffs Dept. An ongoing investigation is underway by the **Chicago Police department**

#1056705, Police Officer, David Woods, as to the taking of the money.

Plaintiff alleges that all defendants are guilty of **CONSPIRACY, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, RACISM**, failing to prevent the other defendants from violating the rights of plaintiff.

The city of Chicago, Chicago police department and the auto pound deprived plaintiff of his for explorer without due process of Law. The Explorer was taken at the time of plaintiff's arrest. The city **AUTOMATICALLY**, imposed a \$2000 dollar fine (penalty) as part of the prerequisite to get his truck back in addition to the tow and impound fee. regardless of the impound and tow fee the \$2000 in mandatory.

NOTE: Plaintiff submit's the above general allegations too all Jane doe numbers 1-3 and john doe numbers 1-7 defendants, also defendants Sandra Bryant and Robert Cranston.

JOHN DOE NUMBER 1

This defendant acting with deliberate indifference and reckless disregards did intentionally inflict emotional and bodily harm upon the plaintiff by hitting him repeatedly, stomping him in the head while he was on the ground. This defendant is a white male police officer.

JOHN DOE NUMBER 2

This defendant is a Caucasian male police officer apprx. 5'09" acting with deliberate indifference and reckless disregards to plaintiff's right to be free of cruel and unusual punishment and police brutality. This defendant shot plaintiff in the back with a teaser gun. Plaintiff resist arrest and did not threaten or display any danger to this defendant. After this defendant shot plaintiff this defendant violently ripped the prongs from plaintiff's back tearing away skin. At the instant time is unknown if this defended also beat plaintiff.

JOHN DOE NUMBER 3

This defendant is a white male police office and acting with deliberate indifference and reckless disregards to plaintiff's constitutional rights did hit plaintiff in the face, kick plaintiff, stomp plaintiff to the ground. At all times within the beating plaintiff never offered any resistance or threaten nor danger to this defendant.

JOHN DOE NUMBER 4

This defendant acting with deliberate indifference and reckless disregards to plaintiff's constitutional right did shoot plaintiff in the back with a teaser gun. At the time this defendant shot plaintiff, the plaintiff did not offer any resistance to arrest nor did

plaintiff present any threat or danger to this defendant. This defendant's identity is unknown at this time and it is not yet known whether this defendant also beat plaintiff.

JOHN DOE NUMBER 5

This defendant acting with deliberate indifference and reckless disregards did falsified police reports also he hit, kicked, beat and stomp plaintiff while plaintiff was being arrested plaintiff did not resist arrest nor did he present any threat or danger to this defendant. These false reports caused plaintiff to be arrested.

JOHN DOE NUMBER 6

This defendant acting with deliberate indifference and reckless disregard did deprive plaintiff of property without due process of law. To wit plaintiff had \$300 cash in his pocket at the time of his arrest. The money was placed in a property bag and receipt given (CPD) #2274251. This defendant took the property from plaintiff without any legal authority. This defendant also caused plaintiff's vehicle to be towed and \$2000 fine to be imposed prior to resolution of the underlying allegation fleeing.

JOHN DOE NUMBER 7

This defendant acting with deliberate indifference and reckless disregards did by his actions or lack thereof did stand by and watch plaintiff being beaten, hit, stomp, kicked and teaser by other police officers, this defendant failed to prevent other officers from violating plaintiff constitution rights from cruel and unusual punishment and deprivation of due process and property

JANE DOE NUMBER 1

This defendant is a white female police officer who was present at the beating of plaintiff. After a male office said the prongs from the teaser were stuck in plaintiff's back. This defendant told the officer to snatch them (prongs) out after which the male officer did and tore away meat in plaintiff's back. At this time it is unclear if this defendant participated in the beating of the plaintiff.

JANE DOE NUMBER 2

This female white police defendant came to ST. Bernard's hospital where plaintiff was being treated for his injuries This defendant and four other officers took plaintiff to a 5x8 foot room and started questing plaintiff. This defendant also falsified police reports and took plaintiff's personal property without due process of law. This defendant is guilty of failing to prevent other officers from violating plaintiff's rights. This defendant also conspired with Jane Doe #3 to commit the acts.

(45 c)

JANE DOE NUMBER 3

This defendant is a female white police officer she came with Defendant Jane Doe #2 was present while plaintiff's rights were being violated this defendant also violated plaintiff's rights by falsifying reports deprivations of property. And conspiring with Jane doe #2.

SANDRA BRYANT

This defendant is guilty of, or failed to prevent, the aforementioned acts including (but not limited to) the beating of plaintiff, also the depriving of property without Due process of law. This defendant conspired, falsified police reports.

ROBERT CRANSTON

This defendant police officer is the reporting officer this defendant is identified, and is guilty of (but no limited to) the aforementioned general allegations, that violated plaintiff's Constitutional rights.

720-5/16-30 (B) Eight times
720-5/16-30 (a) Thirteen times

9. (Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other") The criminal proceedings

☒ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as

follows N/A

☐ Other:

N/A

10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)

SEE attached Pages Number, 45A-45D.

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Face and head Stamped into ground, Plaintiff
was beaten, kicked, hit while on the ground
Plaintiff was Tazered Several time in the back
Plaintiff lost money and his vehicle

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Darwin Wright

Plaintiff's name (print clearly or type): Darwin Wright

Plaintiff's mailing

address: P.O. Box 2903

City Chicago

State IL

ZIP

60690

Plaintiff's telephone number: (312) 623-3859.

Plaintiff's email address (if you prefer to be contacted by email): _____

15. Plaintiff has previously filed a case in this district. ☐ Yes

☒ No

If yes, please list the cases below.

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.